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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

A.B.

Plaintiff

vs

**DR. JASON CAMPBELL
and OREGON HEALTH &
SCIENCE UNIVERSITY**

Defendants

Case No. 3:21-cv-00311-HZ

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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF OREGON
8 PORTLAND DIVISION
9

10 Case No. 3:21-cv-00311-HZ

11 **A.B.**

12 Plaintiff
13

14 vs

15 **DR. JASON CAMPBELL**
16 **and OREGON HEALTH &**
17 **SCIENCE UNIVERSITY**

18 Defendants
19

DECLARATION OF

20 **DECLARATION**

21 I, , declare the following under penalty of perjury:

- 22
- 23 1. I'm am a registered nurse and employee at OHSU.
 - 24 2. I read the complaint filed with the court regarding this matter.
 - 25 3. I was sexually assaulted by Dr. Jason Campbell in almost the same manner
26 as described in the complaint.
 - 27 4.
 - 28

- 1
- 2 **5.** Jason Campbell came into the room. My back was to him. I turned my head
- 3 to say “hi”. Jason did not respond, he just smiled and stared at me while the
- 4 automatic door closed behind him.
- 5
- 6 **6.** Once the door closed completely, Jason Campbell stepped behind me and
- 7 grabbed my hips. He pushed his erect penis into my backside. He forcefully
- 8 grinded into my backside as if to make sure I felt his erection.
- 9
- 10 **7.** I remember Jason Campbell asking me something along the lines of “Do you
- 11 like that?” or “What do you think of that?”
- 12
- 13 **8.** I shoved Jason Campbell off and away from me and yelled “what the fuck!”
- 14 Jason said “Oh, I better get back to work. Let’s talk about this later.” Then
- 15 he left the room.
- 16
- 17 **9.** I told one male nurse and one male nurse assistant about Jason Campbell
- 18 sexually assaulting me in the utility room.

19 **10.**

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21 **11.**

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26 **12.**

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2 **13.** I did not report Jason Campbell sexually assaulting me at first because I
3 feared that OHSU would not believe me
4

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6 **14.** Jason Campbell walked around OHSU as if he was a celebrity, and everyone
7 treated him as such. This only solidified my fear that OHSU would not
8 believe me if I came forward and reported the assault.
9

10 **15.** In December 2020, I told my nurse manager at the time that Jason Campbell
11 sexually assaulted me in the utility room in Fall 2019.
12

13 **16.**
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16 **17.**
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18 **18.** The nurse manager asked me whether I was afraid. I told her that I feared
19 retaliation by OHSU and Jason Campbell.
20

21 **19.**
22

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25 **20.** The nurse manager offered me resources and reported the sexual assault by
26 email the same day.
27

28 **21.** Two days later I was contacted by Julian Roohani and Adam Verne with the
AAEO.

- 1
- 2 **22.** Ms. Roohani conducted the interview while Mr. Verne took notes of the
- 3 interview.
- 4
- 5 **23.** During the interview, Ms. Roohani asked me what I believe were
- 6 inappropriate questions. To list a few, Ms. Roohani asked me questions such
- 7 as “Did you ever have any conversation with him that would make him feel
- 8 like it was ok to do this?” and “Are you friends outside of work or social
- 9 media?” and “Did you tell anyone else?”
- 10
- 11 **24.** I did not receive any information from Ms. Roohani nor Mr. Verne about
- 12 resources such as counseling or assistance.
- 13
- 14 **25.** Ms. Roohani told me that Jason Campbell no longer worked for OHSU but
- 15 would not tell me why.
- 16
- 17 **26.** Ms. Roohani told me that AAEO was not going to do anything because Jason
- 18 Campbell no longer worked for OHSU.
- 19
- 20 **27.** I received notes from my interview from the AAEO. The AAEO said “We’re
- 21 closing this because Jason is gone.” I had no idea what that meant. The
- 22 AAEO did not contact me after this.
- 23
- 24 **28.** Throughout its investigation, the AAEO, specifically, Ms. Roohani and Mr.
- 25 Verne, were very dismissive of me and my claim that Jason Campbell
- 26 sexually assaulted me.
- 27
- 28 **29.** Dr. Emily Baird approached me at work to tell me she was “so sorry” and
- that she “had no idea” that Jason Campbell had sexually assaulted me in
- the utility room.

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2 30. I feel guilty that I did not report being sexually assaulted by Jason
3 Campbell sooner.

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5 DATE: 3.3.2021



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3 UNITED STATES DISTRICT COURT

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7 Case No. 3:21-cv-00311-HZ

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9 Plaintiff

DECLARATION OF

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11 vs

12 **DR. JASON CAMPBELL**
13 **and OREGON HEALTH &**
14 **SCIENCE UNIVERSITY**

15 Defendants
16

17 **DECLARATION**

18 I, , declare the following under penalty of perjury:

- 19
20 1. I read the complaint filed with the court regarding this matter.
21 2. I have been very afraid to come forward because of the length of my career at
22 OHSU and because I am afraid of my reputation being harmed.
23 3. I was sexually assaulted by Dr. Jason Campbell.
24 4.
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2 **5.**

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5 **6.** Once the door to the supply room closed, Jason Campbell grabbed me from
6 behind, he grabbed the front top of my thighs, and he pushed and ground his
7 erection into my backside.

8 **7.** I quickly turned around and yelled, "oh my god!" and Jason Campbell said,
9 "don't worry, nobody saw. I made sure." Then, he walked out of the supply
10 room.
11

12 **8.** Jason Campbell sent me a disappearing photo of his erection through his
13 scrubs.
14

15 **9.**

16
17 **10.** One time via FaceTime, I briefly looked away from the screen, and when I
18 looked back, Jason Campbell had his erect penis out and in his hand. I hung
19 up the call.
20

21 **11.** During another FaceTime, he strangely started talking about having a
22 relationship with me and that he wanted me to meet his family. Then he
23 pulled out his erect penis, and I hung up. The next morning, I saw Jason
24 Campbell had posted on social media declaring his love to his girlfriend. I
25 found this to be disturbing behavior.
26

27 **12.** On several occasions, four or five, Jason Campbell begged to come to my
28 house. I never allowed him to come to my home.

1
2 **13.** Jason Campbell invited me over to his apartment and sent me pins of his
3 address on several occasions. I never went to his home.

4 **14.** I reported being sexually assaulted by Jason Campbell to two OHSU
5 physicians. Both were both disgusted with Jason Campbell and encouraged
6 me to report the assault and harassment.
7

8 **15.** I told the physicians that I feared I would not be believed and that I feared
9 repercussions if I reported that I had been sexually assaulted by Jason
10 Campbell.
11

12 **16.**
13

14
15 **17.** Around March 2020, Jason Campbell approached me while I was leaving
16 Doernbecher Children's Hospital and asked me to sit on a bench with him.

17 **18.** He told me that multiple women in the OHSU ICU have filed sexual
18 harassment complaints against him. He told me, "They are always
19 unfounded. I have Emily Baird wrapped around my finger." I asked him why.
20 He went on about how he can just go into Emily Baird's office, and "it's all
21 cleared." This frightened me.
22

23 **19.**
24

25
26 **20.** Jason Campbell told me that someone sent a multiple-page document with
27 dates and times to Emily Baird and nothing happened.
28

1
2 **21.** Jason Campbell told me that someone else who worked in the MICU had sent
3 a multiple-page complaint to Emily Baird, and he didn't get in trouble.

4 **22.** Jason Campbell told me that someone from the , the same
5 department I work in, complained to Emily Baird about Jason and how he
6 made inappropriate sexual comments.
7

8 **23.** Once Jason Campbell became popular through social media, leaders at
9 OHSU seemed protective of him.
10

11 **24.**

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27 **29.**
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4 **30.** I know the facts I am testifying about based on my personal knowledge.

5
6 Under 28 U.S.C. § 1746, I declare under penalty of perjury that this
7 declaration is true and correct.
8

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10 DATE: _____
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DECLARATION OF

19
20 **DECLARATION**

21 I, , declare the following under penalty of perjury:

- 22
23 1. My name is and I am reaching out about the OHSU lawsuit
24 with Dr. Jason Campbell. I was interviewed last spring by OHSU about my
25 interactions with Dr. Campbell on the unit where I work,
26
27 He was on a rotation in our unit during
28 2019, I cannot remember the exact month but his schedule should be in
historical records.

2.

Dr. Campbell followed

me around my unit asking for "free hugs". I told him it was weird and inappropriate - but he did not discontinue this inappropriate behavior and continued to ask. He also would interact with me in a way that led multiple coworkers to ask if we were dating. I do not believe that I led him on in any way and these interactions were unwanted and inappropriate in the workplace, and made me feel extremely uncomfortable.

3.

I said "I don't remember" out of fear of retaliation, but he did hug me twice. Once in the with no one around, and the other in the both without my consent. Both times I asked him to stop. He would also walk up behind me when I was talking with nurses and touch my shoulders a few times. I also asked him to stop these behaviors multiple times. These interactions with Dr. Campbell were never solicited or wanted, and he had no reason to interact with me in any way from a work perspective at all based on our separate job duties.

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2 4. After my conversation with OHSU leadership I never heard a follow up about
3 their actions regarding these concerns of Dr. Campbell's behavior, until this
4 week when I read the Oregon Live article.
5

6
7
8 5. I know the facts I am testifying about based on my personal knowledge.
9 Under 28 U.S.C. § 1746, I declare under penalty of perjury that this
10 declaration is true and correct.
11

12
13 DATE: 3/6/21
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